

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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**WORLD WIDE LICENSES, LTD.,**  
a Hong Kong corporation,

Plaintiff,

v.

C.A. No. 07-96 (\*\*\*)

**POLAROID CONSUMER  
ELECTRONICS, LLC  
f/k/a PETTERS CONSUMER  
BRANDS, LLC,**  
a Delaware company,

Defendant.

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**JURY TRIAL DEMANDED**

**MOTION FOR ENTRY OF DEFAULT**

Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, Plaintiff, World Wide Licenses, Ltd. (“WWL”), respectfully requests entry by the Clerk of Court of the default of defendant, Polaroid Consumer Electronics, LLC f/k/a Petters Consumer Brands, LLC (“Defendant”). WWL states as follows in support of its request:

1. On February 20, 2007, WWL initiated this proceeding by the filing of its Complaint against Defendant.

2. Thereafter, as appears on the Return of Service filed in this action, WWL served Defendant with the summons and Complaint on March 20, 2007, through in-hand service upon the Defendant’s registered agent, National Registered Agents, 160 Greentree Drive, Dover, Delaware.

3. As reflected on this Court’s docket, and as stated in the Summons, Defendant was required to answer the Complaint by April 9, 2007.

4. To date, Defendant has not appeared, moved, answered or otherwise responded to the Complaint.

5. Rule 55(a) provides for the entry of default due to the failure of a party to plead or otherwise defend an action.

6. This Court's docket reflects the failure of Defendant to plead or otherwise defend and its failure to answer the summons. Accordingly, this Court should enter a default against Defendant pursuant to Fed. R. Civ. P. 55(a).

WHEREFORE, WWL respectfully requests that the Clerk enter the default of Polaroid Consumer Electronics, LLC f/k/a Petters Consumer Brands, LLC, and grant WWL such other and further relief as the Court deems just and proper.

Dated: April 16, 2007

**DUANE MORRIS LLP**

/s/ Matt Neiderman

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